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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10 HANFORD/INL PROJECT OFFICE
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

July 27, 2006

Matthew McCormick
U.S. Department of Energy
PO Box 550, A5-11
Richland, WA 99352

Re: EPA Review Comments on the 200-MW-1 Remedial Investigation Report

Dear Mr. McCormick:

69637

The U.S. Environmental Protection Agency (EPA) appreciates the opportunity to review and comment on the 200-MW-1 Remedial Investigation Report (DOE/RL-2005-62). We also appreciate the extended review period to accommodate EPA staff work schedules and priorities. This letter addresses the major comments or issues that EPA has identified related to the Remedial Investigation (RI) Report for 200-MW-1. EPA requests that an initial meeting be scheduled with project staff to discuss the major comments and to work through minor comments.

EPA believes that some of the major comments below have applicability more broadly to the operable units across the 200 Area on Hanford's central plateau and we wish to discuss them in that light when we meet with project staff.

First, EPA finds that the RI Report has met the original intent to compile the characterization information resulting from implementation of the Remedial Investigation/ Feasibility Study (RI/FS) work plan (as amended to postpone the documentation of characterization activities at the 216-A-4 Crib to the FS). However, we believe that some further characterization is necessary prior to issuing an FS Report and Proposed Plan for public review. The following discussion will address the reasons for this need to further characterize the waste sites contained in the operable unit.

Experience with the first set of operable units being investigated in the 200 Area has brought to our attention the need to better tailor our RI approach to match the goal of developing final Records of Decision (RODs) for many of the source operable units. The 200 Areas RI/FS Implementation Plan and protocols developed for 100 Area cleanup (where most RODs are interim, rather than final) have not promoted the upfront accumulation of field characterization data and risk assessment activities necessary to develop baseline risk assessments (both ecological and human-health risk). These baseline risk assessments are necessary before final RODs can be written.

The 200 Areas RI/FS Implementation Plan provides documentation of several early RI/FS activities in the 200 Area and discusses the representative and analogous waste site characterization approach. This approach provides a valid means of balancing the concept of

"getting on with it" with the benefit of having more robust field characterization data on all waste sites prior to remedial decisions. The approach relies on confirmation, design, and verification sampling post-ROD for representative and analogous sites. However, the 200 Areas RI/FS Implementation Plan also contains language about waste site characterization data being continuously evaluated for uncertainty and adequacy to support decision making and the possibility of subsequent data quality objective (DQO) efforts (Section 6.2.1). This is consistent with the Tri-Party focus on obtaining further site-specific characterization information on waste sites across the central plateau and the ongoing DQO process to help identify additional sampling and analysis.

Judging from the contents of the RI Report, additional near-surface characterization information is needed for the baseline ecological risk assessment. This would most likely be in the form of soil sampling that is performed so that it is directly comparable to the Central Plateau Ecological Risk Assessment information collected at specific waste sites and reference sites in and around the 200 Area. This provides a more realistic estimate of risk at the representative sites than the screening-level evaluation documented in the RI Report. Also, since the goal is to have a final ROD for this operable unit, such work is necessary to perform a baseline ecological risk assessment.

The other potential need for more field characterization is related to concerns EPA has expressed on the characterization and modeling for the 216-U-12 Crib. If any of the issues affecting 216-U-12 come into play with the 216-T-33 Crib (a 200-MW-1 representative site), it may be necessary to further characterize the waste site to reduce uncertainties that would make it difficult to support a statement of protectiveness for any potential remedies employed. There is not enough detail in the RI Report to understand the potential for contaminants to have moved laterally (possibly due to tipping beds or fine-textured layers) and then proceed toward the groundwater table and thus be missed by a single borehole and an existing borehole 55 feet away. (Distance estimated using the northings and eastings of the borehole locations because the distance between the two boreholes presented was not provided in the RI Report.) However, given the short operation of the 216-T-33 Crib and if information on volumes discharged to it are accurate, the potential for groundwater contamination may not be as significant as it would be at other cribs in the 200 Area.

This concludes the major comments from our review of the RI Report. If you have questions, contact me at (509) 376-8665.

Sincerely,

Craig Cameron

Craig Cameron
Project Manager

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